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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NIKKIE LYNN CHEEK, an Individual;  
NIKKIE LYNN CHEEK and KATHLEEN J.  
MANGIONE as Co-Special Administrators for  
the ESTATE OF ALINA R. HIGUERA

Plaintiff,

vs.

CENTRAL TRUCKING INC., a Foreign  
Corporation; HAROLD EUGENE STROUSE,  
an Individual; DOES I through X, inclusive; and  
ROE BUSINESS ENTITIES I through X  
inclusive,

Defendants.

CASE NO.: 2:22-cv-00271-GMN-BNW

STIPULATED DISCOVERY PLAN  
AND SCHEDULING ORDER

(SPECIAL SCHEDULING  
REVIEW REQUESTED)

1. **Meeting:** The parties conducted the Rule 26(f) conference on April 4, 2022.
2. **Pre-Discovery Disclosures:** The parties will serve their respective disclosures on or before April 18, 2022.
3. **Discovery Plan:** The parties propose a longer period for discovery than that specified in LR 26-1(b). The reasons for the proposed longer discovery period is due to the court's backlog of cases caused by the COVID-19 pandemic, as well as counsels' upcoming trial schedule, which will delay counsel's ability to conduct discovery. Consequently, the parties need



1 additional time to complete all discovery. The parties propose the discovery period below,  
 2 calculated 365 days from February 11, 2022, the date of Defendants' Petition for Removal.

3 Amending the Pleadings and Adding Parties	November 13, 2022
4 Initial Expert Disclosure	December 13, 2022
5 Rebuttal Expert Disclosures	January 12, 2023
6 Discovery Cut-Off Date	February 11, 2023
7 Dispositive Motions	March 15, 2023
8 Joint Pre-Trial Order, if No Dispositive Motions	April 14, 2023

9 The parties certify they have conferred about the possibility of using alternative dispute  
 10 resolution processes, specifically mediation, and are considering whether it would be mutually  
 11 beneficial before preliminary discovery is completed. Counsel agreed to confer with their  
 12 respective clients before making a decision.

13 The parties also considered, but declined, to consent to a trial by a magistrate judge and  
 14 the use of the short trial program.

15 Further, the parties discussed electronic evidence, but have no electronic evidence to  
 16 present at this time. The parties stipulate they will provide discovery in an electronic format with  
 17 the Court's electronic jury evidence display system.

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Plaintiffs agree to receive electronic service at [tterry@christiansenlaw.com](mailto:tterry@christiansenlaw.com),  
[keely@christiansenlaw.com](mailto:keely@christiansenlaw.com), [jcrain@christiansenlaw.com](mailto:jcrain@christiansenlaw.com), [ab@christiansenlaw.com](mailto:ab@christiansenlaw.com),  
[chandi@christiansenlaw.com](mailto:chandi@christiansenlaw.com), and [esther@christiansenlaw.com](mailto:esther@christiansenlaw.com). Defendants agree to receive  
electronic service at [awestbrook@perrywestbrook.com](mailto:awestbrook@perrywestbrook.com) and [jmeacham@perrywestbrook.com](mailto:jmeacham@perrywestbrook.com).

Dated this 14th day of April, 2022.

Dated this 14th day of April, 2022.

CHRISTIENSEN TRIAL LAWYERS

PERRY & WESTBROOK

/s/ Keely A. Perdue

/s/ Alan W. Westbrook

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### **ORDER**

IT IS ORDERED that ECF No. 7 is DENIED. The Court does not find good cause for the lengthy discovery period the parties requested.

IT IS FURTHER ORDERED that the parties must file a new proposed discovery plan and scheduling order by 4/22/2022 and may seek up to an additional 90 days beyond the standard 180-day discovery plan starting from February 11, 2022.

IT IS SO ORDERED

DATED: 3:56 pm, April 19, 2022



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE



AW

**From:** Alan W. Westbrook awestbrook@perrywestbrook.com

**Subject:** Re: Nikkie Lynn Cheek, et. al. v. Central Trucking, et. al.

**Date:** April 12, 2022 at 2:19 PM

**To:** Keely Perdue keely@christiansenlaw.com, Jennifer Meacham jmeacham@perrywestbrook.com

**Cc:** Aileen Bencomo ab@christiansenlaw.com, Jonathan Crain jcrain@christiansenlaw.com, Todd Terry terry@christiansenlaw.com, Veronica Gonzalez vgonzalez@perrywestbrook.com, Milica Bosnjak mbosnjak@perrywestbrook.com

Hello Keely,

Looks good, you may affix my e-signature,

Thank you,

Alan

On 4/11/2022 9:59 AM, Keely Perdue wrote:

Alan,

The revised draft is attached. Please confirm we can submit with your e-signature.

Thank you,

Keely P. Chippoletti, Esq.  
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